

Exhibit B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**SCHEIN'S FIRST SET OF
DOCUMENT REQUESTS TO
DEFENDANT GLOBAL**

Pursuant to Fed. R. Civ. P. 26 and 34, Rule 26.3 of the Local Rules for the United States District Court for the Eastern District of New York and by order of the Court, Plaintiff Henry Schein, Inc. ("Schein") by its attorneys Proskauer Rose LLP, hereby requests that Defendant Holbrook Enterprises, LLC d/b/a Global Medical & Dental ("Global") respond to these document requests and produce copies of every responsive document, at such time as may be directed by the Court.

REQUESTS

Request No. 1

All communications of any type, or any Document that refers to any such communications, between or among Holbrook or Global (or any of their agents or affiliates) on the one hand and Patterson Dental (or any agent or affiliate of Patterson Dental), on the other.

Request No. 2

Any and all contracts or agreements between or among Holbrook and Global on the one hand and Patterson Dental, on the other.

Request No. 3

All Documents that Holbrook or Global, or its lawyers, accountants, consultants, or other representatives made available to Patterson or its lawyers, accountants, consultants, or other representatives.

Request No. 4

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to sell Global and/or its assets to Patterson Dental, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to Patterson Dental.

Request No. 5

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to sell Global and/or its assets to Schein, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to Schein.

Request No. 6

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to sell Global and/or its assets to any third party other than Schein or Patterson Dental, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to such third party.

Request No. 7

All Documents concerning any commissions earned by you or Holbrook relating to the sale of dental products in Hawaii, including, but not limited to, documents reflecting the amounts of such commissions and any documents reflecting any agreements or negotiations regarding the terms of such commissions.

Request No. 8

All Documents concerning the issues or disputes referred to in your May 22, 2009 letter to Schein.

Request No. 9

All Documents concerning any lists of purchasers of Schein products, such purchasers' needs and requirements, Schein's business methods, Schein's operational procedures, cost and price information concerning Schein products, organizational and/or other business or financial information concerning Schein, or any other information for or incidental to the manufacture, marketing, or promotion of Schein products or the business structure or related elements or areas of Schein's organization.

Request No. 10

All Documents concerning communications between any representative of Global

and any representative of Patterson Dental regarding the sale of dental products in Hawaii.

Request No. 11

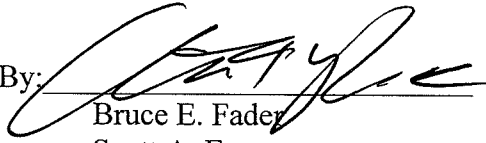
All Documents concerning any lawsuits between Global and/or Holbrook and Mark F. Heilbron d/b/a M.F.H. Consultants, Inc. ("MFH") concerning the assignment of the 1996 Schein Exclusive Sales Agent Agreement from MFH to Global and/or Holbrook.

Request No. 12

All Documents concerning any training programs or guides provided by Schein for Global employees or representatives.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By: 
Bruce E. Fader

Scott A. Eggers

Anthony T. Wladyka, III

1585 Broadway
New York, NY 10036
Tel.: 212.969.3000
Fax: 212.969.2900

DEFINITIONS AND INSTRUCTIONS

1. These document requests incorporate by reference and utilize the Uniform Definitions in Discovery Requests as set forth in Local Civil Rule 26.3 of the Eastern District of New York.

2. As used herein, the term “Document” is synonymous with the meaning of the term as defined in the Federal and Local Rules of Civil Procedure and includes, but is not limited to, all electronic mail.

3. As used herein, the terms “you” or “your” refer to Defendant Global and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

4. As used herein, the term “Schein” refers to Plaintiff Henry Schein, Inc., and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

5. As used herein, the term “Holbrook” refers to Defendant Craig Holbrook and his agents, employees or independent contractors working on his behalf.

6. As used herein, the term “Patterson Dental” refers to Defendant Patterson Dental Supply, Inc. and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

7. You are required to respond separately and fully to each document request.

8. In responding to these document requests, you are requested to furnish all documents known or available to you regardless of whether this information is possessed directly by you, or by your agents, employees, family members, representatives, or investigators; your affiliates, predecessors or corporations or partnerships; or by any other legal entities controlled by or in any manner affiliated with you.

9. These document requests are continuing in nature. If, at any time after service of the initial answers hereto and prior to the trial of this action, you obtain additional documents responsive to these document requests, you are required promptly to supplement or amend your answers hereto in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

10. If any of the documents requested is claimed to be immune from discovery on the grounds of privilege, describe the basis of the privilege claimed and describe the documents alleged to be privileged in detail sufficient to enable the Court to decide if the privilege has been properly invoked.

11. Unless otherwise stated, the time period to be used in responding to these Requests is January 1, 2002 through the present.

Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**SCHEIN'S FIRST SET OF
DOCUMENT REQUESTS TO
DEFENDANT CRAIG HOLBROOK**

Pursuant to Fed. R. Civ. P. 26 and 34, Rule 26.3 of the Local Rules for the United States District Court for the Eastern District of New York and by order of the Court, Plaintiff Henry Schein, Inc. ("Schein") by its attorneys Proskauer Rose LLP, hereby requests that Defendant Craig Holbrook ("Holbrook") respond to these document requests and produce copies of every responsive document, at such time as may be directed by the Court.

REQUESTS

Request No. 1

All communications of any type, or any Document that refers to any such communications, between or among Holbrook or Global (or any of their agents or affiliates) and Patterson Dental or any agent or affiliate of Patterson Dental, on the other.

Request No. 2

Any and all contracts or agreements between or among Holbrook and Global on the one hand and Patterson Dental, on the other.

Request No. 3

All Documents that Holbrook or Global, or its lawyers, accountants, consultants, or other representatives made available to Patterson, or its lawyers, accountants, consultants, or other representatives.

Request No. 4

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to sell Global and/or its assets to Patterson Dental, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to Patterson Dental.

Request No. 5

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to sell Global and/or its assets to Schein, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to Schein.

Request No. 6

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to sell Global and/or its assets to any third party other than Schein or Patterson Dental, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to such third party.

Request No. 7

All Documents concerning any commissions earned by you or Global relating to the sale of dental products in Hawaii, including, but not limited to, documents reflecting the amounts of such commissions and any documents reflecting any agreements or negotiations regarding the terms of such commissions.

Request No. 8

All Documents concerning the issues or disputes referred to in your May 22, 2009 letter to Schein.

Request No. 9

All Documents concerning any lists of purchasers of Schein products, such purchasers' needs and requirements, Schein's business methods, Schein's operational procedures, cost and price information concerning Schein products, organizational and/or other business or financial information concerning Schein, or any other information for or incidental to the manufacture, marketing, or promotion of Schein products or the business structure or related elements or areas of Schein's organization.

Request No. 10

All Documents concerning communications between you and any representative

of Patterson Dental regarding the sale of dental products in Hawaii.

Request No. 11

All Documents concerning any lawsuits between Global and/or Holbrook and Mark F. Heilbron d/b/a M.F.H. Consultants, Inc. ("MFH") concerning the assignment of the 1996 Schein Exclusive Sales Agent Agreement from MFH to Global and/or Holbrook.

Request No. 12

All Documents concerning any training programs or guides provided by Schein for Global employees or representatives.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By: 

Bruce E. Fader

Scott A. Eggers

Anthony T. Wladyka, III

1585 Broadway

New York, NY 10036

Tel.: 212.969.3000

Fax: 212.969.2900

DEFINITIONS AND INSTRUCTIONS

1. These document requests incorporate by reference and utilize the Uniform Definitions in Discovery Requests as set forth in Local Civil Rule 26.3 of the Eastern District of New York.

2. As used herein, the term “Document” is synonymous with the meaning of the term as defined in the Federal and Local Rules of Civil Procedure and includes, but is not limited to, all electronic mail.

3. As used herein, the terms “you” or “your” refer to Defendant Holbrook and any agents, employees or independent contractors working on your behalf.

4. As used herein, the term “Schein” refers to Plaintiff Henry Schein, Inc., and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

5. As used herein, the term “Global” refers to Defendant Holbrook Enterprises, LLC d/b/a Global Medical & Dental and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

6. As used herein, the term “Patterson Dental” refers to Defendant Patterson Dental Supply, Inc. and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

7. You are required to respond separately and fully to each document request.

8. In responding to these document requests, you are requested to furnish all documents known or available to you regardless of whether this information is possessed directly by you, or by your agents, employees, family members, representatives, or investigators; your

affiliates, predecessors or corporations or partnerships; or by any other legal entities controlled by or in any manner affiliated with you.

9. These document requests are continuing in nature. If, at any time after service of the initial answers hereto and prior to the trial of this action, you obtain additional documents responsive to these document requests, you are required promptly to supplement or amend your answers hereto in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

10. If any of the documents requested is claimed to be immune from discovery on the grounds of privilege, describe the basis of the privilege claimed and describe the documents alleged to be privileged in detail sufficient to enable the Court to decide if the privilege has been properly invoked.

11. Unless otherwise stated, the time period to be used in responding to these Requests is January 1, 2002 through the present.

Exhibit D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**SCHEIN'S FIRST SET OF
DOCUMENT REQUESTS TO
DEFENDANT PATTERSON DENTAL**

Pursuant to Fed. R. Civ. P. 26 and 34, Rule 26.3 of the Local Rules for the United States District Court for the Eastern District of New York and by order of the Court, Plaintiff Henry Schein, Inc. ("Schein"), by its attorneys Proskauer Rose LLP, hereby requests that Defendant Patterson Dental Supply, Inc. ("Patterson Dental") respond to these document requests and produce copies of every responsive document, at such time as may be directed by the Court.

REQUESTS

Request No. 1

All communications of any type, or any Document that refers to any such communications, between or among Holbrook and Global (or any agent or affiliate of Holbrook or Global) on the one hand and Patterson Dental (or any agent or affiliate of Patterson Dental), on the other.

Request No. 2

Any and all contracts or agreements between or among Holbrook and Global on the one hand and Patterson Dental, on the other.

Request No. 3

All Documents concerning, or prepared for the purpose of, any efforts, communications, or negotiations to purchase Global and/or its assets, including, but not limited to, sale books, presentations, offers, term sheets, contracts, draft contracts, or valuation documents, whether or not previously provided to Global.

Request No. 4

All Documents concerning any contracts, negotiations, or agreements between Schein and Global relating to the sale of Schein products in Hawaii, including, but not limited to, the April 1, 1996 Exclusive Sales Agent Agreement between Schein and Mark F. Heilbron d/b/a M.F.H. Consultants, Inc., including the 2002 and 2005 amendments thereto.

Request No. 5

All Documents concerning any lists of purchasers of Schein products, those purchasers' needs and requirements, Schein's business methods, Schein's operational

procedures, cost and price information concerning Schein products, organizational and/or other business or financial information concerning Schein, or any other information for or incidental to the manufacture, marketing, or promotion of Schein products or the business structure or related elements or areas of Schein's organization.

Request No. 6

All Documents concerning the issues or disputes raised in Global's May 22, 2009 letter to Schein, annexed to the Complaint in the action as Exhibit D.

Request No. 7

All Documents concerning communications between any representative of Global and any representative of Patterson Dental regarding the sale of dental products in Hawaii.

Request No. 8

All Documents concerning Patterson Dental's contract with the sales representatives employed by Global prior to the sale of Global and/or all or substantially all of the assets of Global to Patterson Dental.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By: 

Bruce E. Fader
Scott A. Eggers
Anthony T. Wladyka, III

1585 Broadway
New York, NY 10036
Tel.: 212.969.3000
Fax: 212.969.2900

DEFINITIONS AND INSTRUCTIONS

1. These document requests incorporate by reference and utilize the Uniform Definitions in Discovery Requests as set forth in Local Civil Rule 26.3 of the Southern District of New York.
2. As used herein, the term “Document” is synonymous with the meaning of the term as defined in the Federal and Local Rules of Civil Procedure and includes, but is not limited to, all electronic mail.
3. As used herein, the terms “you” or “your” refer to Defendant Patterson Dental and any subsidiary, parent, affiliated entity, predecessor company or division and any trustee, officer, director, manager, agent, or employee of Patterson Dental.
4. As used herein, the term “Schein” refers to Plaintiff Henry Schein, Inc., and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.
5. As used herein, the term “Global” refers to Defendant Holbrook Enterprises, LLC d/b/a Global Medical & Dental and its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.
6. As used herein, the term “Holbrook” refers to Defendant Craig Holbrook.
7. You are required to respond separately and fully to each document request.
8. In responding to these document requests, you are requested to furnish all documents known or available to you regardless of whether this information is possessed directly by you, or by your agents, employees, family members, representatives, or investigators; your affiliates, predecessors or corporations or partnerships; or by any other legal entities controlled by or in any manner affiliated with you.

9. These document requests are continuing in nature. If, at any time after service of the initial answers hereto and prior to the trial of this action, you obtain additional documents responsive to these document requests, you are required promptly to supplement or amend your answers hereto in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

10. If any of the documents requested is claimed to be immune from discovery on the grounds of privilege, describe the basis of the privilege claimed and describe the documents alleged to be privileged in detail sufficient to enable the Court to decide if the privilege has been properly invoked.

11. Unless otherwise stated, the time period to be used in responding to these Requests is January 1, 2002 through the present.

Exhibit E

Bruce E. Fader
Scott A. Eggers
Anthony T. Wladyka, III
PROSKAUER ROSE
1585 Broadway
New York, NY 10036-8299
Phone: (212) 969-3000
Fax: (212) 969-2900
Email: seggers@proskauer.com

Attorneys for Plaintiff Henry Schein, Inc.

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**NOTICE OF DEPOSITION
OF CRAIG HOLBROOK**

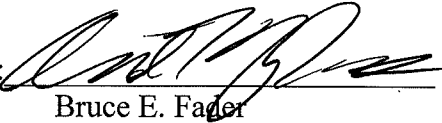
PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, the undersigned will take the deposition upon oral examination of Craig Holbrook before a notary public or other person authorized to administer oaths, at the offices of Proskauer Rose LLP, 1585 Broadway, New York, New York, on July __, 2009 commencing at 10:00 a.m. The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

PLEASE TAKE FURTHER NOTICE that the witness shall produce all documents in his custody or control relating to the subject matter of this litigation at, or before, the time of the deposition.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By:

A handwritten signature in black ink, appearing to read "Bruce E. Fader", written over a horizontal line.

Bruce E. Fader

Scott A. Eggers

Anthony T. Wladyka, III

1585 Broadway
New York, NY 10036
Tel.: 212.969.3000
Fax: 212.969.2900

Exhibit F

Bruce E. Fader
Scott A. Eggers
Anthony T. Wladyka, III
PROSKAUER ROSE
1585 Broadway
New York, NY 10036-8299
Phone: (212) 969-3000
Fax: (212) 969-2900
Email: seggers@proskauer.com

Attorneys for Plaintiff Henry Schein, Inc.

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**NOTICE OF DEPOSITION
OF GRANT GOERKE**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, the undersigned will take the deposition upon oral examination of Grant Goerke before a notary public or other person authorized to administer oaths, at the offices of Proskauer Rose LLP, 1585 Broadway, New York, New York, on July ___, 2009 commencing at 10:00 a.m. The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

PLEASE TAKE FURTHER NOTICE that the witness shall produce all documents in his custody or control relating to the subject matter of this litigation at, or before, the time of the deposition.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By: 

Bruce E. Fader

Scott A. Eggers

Anthony T. Wladyka, III

1585 Broadway

New York, NY 10036

Tel.: 212.969.3000

Fax: 212.969.2900

Exhibit G

Bruce E. Fader
Scott A. Eggers
Anthony T. Wladyka, III
PROSKAUER ROSE
1585 Broadway
New York, NY 10036-8299
Phone: (212) 969-3000
Fax: (212) 969-2900
Email: seggers@proskauer.com

Attorneys for Plaintiff Henry Schein, Inc.

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**NOTICE OF RULE 30(b)(6)
DEPOSITION OF HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the undersigned will take the deposition upon oral examination of Holbrook Enterprises, LLC d/b/a Global Medical & Dental ("Global") by an officer, director, shareholder, employee or other person or persons to be designated by Global having knowledge of the Exclusive Sales Agent Agreement between Henry Schein, Inc. and Global; the efforts to sell Global; the negotiations with and sale to Patterson Dental Supply, Inc. ("Patterson Dental") of Global and/or all or substantially all of its assets; and the subsequent operations of the Global business. The deposition will take place before a notary public or other officer authorized by law to administer oaths at the offices of Proskauer Rose LLP, 1585 Broadway, New York, New

York, on July ___, 2009 commencing at 10:00 a.m. The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

PLEASE TAKE FURTHER NOTICE that the witness shall produce all documents in his custody or control relating to the subject matter of this litigation at, or before, the time of the deposition.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By: 

Bruce E. Fader

Scott A. Eggers

Anthony T. Wladyka, III

1585 Broadway
New York, NY 10036
Tel.: 212.969.3000
Fax: 212.969.2900

Exhibit H

Bruce E. Fader
Scott A. Eggers
Anthony T. Wladyka, III
PROSKAUER ROSE
1585 Broadway
New York, NY 10036-8299
Phone: (212) 969-3000
Fax: (212) 969-2900
Email: seggers@proskauer.com

Attorneys for Plaintiff Henry Schein, Inc.

HENRY SCHEIN, INC.,
a Delaware corporation,

Plaintiff,

v.

CRAIG HOLBROOK, HOLBROOK
ENTERPRISES, LLC d/b/a GLOBAL
MEDICAL & DENTAL, a Hawaii limited
liability company, and PATTERSON DENTAL
SUPPLY, INC., a Minnesota corporation,

Defendants.

09 Civ. 2769 (LDW)(AKT)

**NOTICE OF RULE 30(b)(6)
DEPOSITION OF PATTERSON
DENTAL SUPPLY, INC.**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the undersigned will take the deposition upon oral examination of Patterson Dental Supply, Inc. ("Patterson Dental") by an officer, director, shareholder, employee or other person or persons to be designated by Patterson Dental having knowledge of the negotiations with and acquisition of Holbrook Enterprises, LLC d/b/a Global Medical & Dental ("Global") and/or all or substantially all of its assets by Patterson Dental and the subsequent operations of the Global business. The deposition will take place before a notary public or other officer authorized by law to administer oaths at the offices of Proskauer Rose LLP, 1585 Broadway, New York, New

York, on July ___, 2009 commencing at 10:00 a.m. The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

PLEASE TAKE FURTHER NOTICE that the witness shall produce all documents in his custody or control relating to the subject matter of this litigation at, or before, the time of the deposition.

Dated: New York, New York
June 30, 2009

PROSKAUER ROSE LLP
Attorneys for Plaintiff Henry Schein, Inc.

By: 

Bruce E. Fader

Scott A. Eggers

Anthony T. Wladyka, III

1585 Broadway

New York, NY 10036

Tel.: 212.969.3000

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